

Manatee County Government

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FAX TRANSMISSION COVER SHEET

Date: July 1, 2002

To: Brad Jackson
U.S. Environmental Protection Agency
Waste Management Division

Fax: (404) 562-8896

Re: MARS/Piney Point Solution

From: Charlie Hunsicker, Ecosystems Administrator

You should receive 12 page (s), including this cover sheet.

Per our conversation, enclosed is a fact sheet covering the development of the MARS/Piney Point Solution. A hard copy will be overnighted today.

The funding received thus far is summarized below:

<u>Fund Year</u>	<u>Amount</u>	<u>S.T.A.G. Account</u>
1995	\$4,059,400	X
1996	2,250,000	X
1998	250,000	X

Future authorization for funding PL-106-457; Title 6.

Thank you for your assistance.



Charlie Hunsicker - RE: Draft letter for Congressional appropriations (edited)

From: Charlie Hunsicker
To: Melissa, Figge,
Date: 5/14/02 7:15 PM
Subject: RE: Draft letter for Congressional appropriations (edited)
CC: Jocelyn.hong@verizon.net

Estimates for the MARS portion of the project approach 45 million for the build out of the pipelines interconnecting the three wastewater plants. These costs are directly related to pipeline design , right of way and installation.

This cost estimate does not include the costs of connecting farmers to the pipelines --- which is what we have been requesting funding from USDA for through our local USDA/RC&D---estimated at 10 or 15 million...no firm estimate has been made at this point for that piece. This 45 million also does not include construction of a wet weather management system to back up the MARS distribution and irrigation systems during rainy weather(either a series of three to four aquifer storage and recovery wells (ASR Wells) or a pipeline and inter-connection with the cooling pond at Florida Power and Light's generating plant in Manatee County.

The total cost for the Piney Point/MARS segment(we really need to be discussing or characterizing it in this way) is estimated at \$10 million , \$8 million of that for connecting pipelines between Piney Point and Florida Power and Light and between that pipeline and the "main" MARS pipeline, and \$2 million estimated for construction needed at the FP&L's cooling pond impoundment to increase it's ability to temporarily store (from year to year) an additional 1.3 billion gallons of water---enough to provide for the temporary storage of treated water from Piney Point and any excess MARS water during the rainy season for reuse during the dry season.

Remember also that the Piney Point/Mars to FP&L pipeline segment constructed under this emergency solution will continue to be used permanently for the benefit of distributing reclaimed wastewater (RECLAIMED WATER) to agricultural acreage located along the route of the pipeline, relieving pressure on the over pumped Floridan Aquifer, long after all the treated process water from Piney Point is safely reused for irrigation... because of the interconnection of this pipeline segment to the main MARS pipeline and distribution system included as part of this emergency, long range solution for Piney Point.

The State of Florida (FDEP) is spending up to \$35 million (from funds legislatively re-

appropriated from a reserve established to restore lands mined in the State prior to 1975 before company reclamation laws requiring companies to restore mining cuts were on the books... meaning that some lands mined in the 60's and 70's in central florida may never be reclaimed...)just to treat the water at Piney Point to a condition that it can safely be discharged into Tampa Bay but lost to any reasonable use to deter the effects of drought in this region. The Piney point/Mars pipeline solution at \$10 million---\$5 million federal / \$5 million State-Local--- is a win for the environment of Tampa Bay, a win for the farmers needing water for growing food, a positive for FP&L if water chemistry and regulatory issues can be addressed to the satisfaction of FP&L , and a permanent solution for the continuing viability of the MARS program with or without the success of ASR well wet weather back up coming on line in the future.

Charlie Hunsicker
Ecosystems Administrator

Need to reach me outside of E-Mail?

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Fax: 941.745.3790

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(or P.O. Box 1000)
Bradenton, Florida, 34206

>>> "Figge, Melissa" <Melissa.Figge@mail.house.gov> 05/14/02 12:44PM >>>

Charlie~

Explain to me the economics of MARS and Piney Point pipeline. What's the total cost of the MARS project? How does that break down? What the total cost of Piney Point separate from MARS? What's the break down? Or are the cost one in the same?

Melissa

Melissa Figge, Legislative Assistant/Press

U.S. Congressman Dan Miller (FL-13)

102 Cannon HOB, Washington, DC 20515

202-225-5015 (tel) 202-226-0828 (fax)

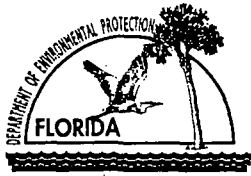
-----Original Message-----

From: Charlie Hunsicker [mailto:charlie.hunsicker@co.manatee.fl.us]
Sent: Tuesday, April 16, 2002 7:23 PM
To: mel_klein@fpl.com
Cc: Amy Stein; Ernie Padgett; george.harris@co.manatee.fl.us; gwen.brown@co.manatee.fl.us; Jane von Hahmann; Joe McClash; Jonathan Bruce; Pat Glass; Jocelyn.Hong@verizon.net
Subject: Draft letter for Congressional appropriations (edited)

Final edits as suggested have been incorporated into this draft letter for your review. If acceptable, this letter will be forwarded to Congressman Miller's staff for consideration to clarify the rationale for our request of \$2 million from US EPA through the House Appropriations Committee process to support this option and MARS expansion. I must apologize for the rush information and production of this draft letter as the County attempted to meet time-sensitive requirements of the Congressional Appropriations Committee. This letter or its final form as may be approved by Congressman Miller is intended to serve as a place-holder for the County (and the State of Florida) to secure an appropriate level of support to implement this option. Manatee County is aware of the serious concerns of Florida Power & Light which must be addressed before the cooperation of the company can be obtained to implement this solution. These include: a resolution of any and all water quality concerns in the interest of plant operations and protection of fisheries and biology in the cooling pond; all issues involving jurisdiction over the water in the cooling pond which must be satisfactory to FP&L; the possible use of transmission right-of-way for pipeline placement; a recognition that any solution be obtained at no cost to FP&L customers; and finally, a recognition that many terms and conditions must be fairly discussed and negotiated before a final plan can be supported.

Charlie Hunsicker
Ecosystems Administrator

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Memorandum

Florida Department of Environmental Protection

To: Suzanne Cooper, Agency on Bay Management

From: Phil Coram, P.E.

Date: June 3, 2002

Re: Piney Point – Status Update

The following is a status update on Piney Point for distribution to the interested parties.

Rainfall and Storage Capacity: As of May 27 the site has received 11.2 inches of rainfall, which is 3.71 inches below the average rainfall estimate for this year. As of May 27 the nominal water management storage capacity was 254 million gallons or about 20.5 inches of rainfall run-off over the watershed. (Note that the current nominal storage capacity is adequate to contain the 100 year-24 hour storm event). If emergency freeboard is utilized, these numbers increase to 308 million gallons of storage or 24.9 inches of rainfall run-off.

Water Management Goals: Based on certain water management options implemented so far, or expected to be completed by the end of June (e.g. construction of additional storage and watershed segregation) there is still a need to obtain an additional water management capacity of 124 million gallons by the end of October in planning for wetter than average rainfall (e.g. El Nino).

These estimates are based on providing capacity not only for the wetter than average rainfall but also for the additional run-off from a 100 year-24 hour storm event. These estimates are dynamic and will change based on the actual amount of rainfall received and current water management inventories.

Additional water management capacity can be achieved by transport off-site or surface water discharge of treated process water. Water management options that beneficially use the process water are preferred. Increased use of reverse osmosis is being explored to minimize reliance on costly transfers that are wet weather sensitive, and to actively reduce the water inventory so as to allow closure to begin shortly after the rainy season. Options that result in surface water discharge of treated or partially treated process water will be implemented only when required to prevent a catastrophic release of untreated process water.

Water Management Options: The attached table provides detailed information on the status of the primary water management options being implemented or evaluated to meet the water management goals described above. Currently authorized options are capable of consuming as much as 155 million gallons or 25% more than the 124 million-gallon goal recommended. The options include:

- Transfer Double Stage Treated Aerated Water to Manatee County...21 Mgal

- Transfer Single Stage Treated Water to Cargill's Riverview Plant....18 Mgal
- Transfer Untreated Water To CF's Plant City Facility.....55 Mgal
- Treat by Reverse Osmosis (*Phases I & II*).....61 Mgal+

Other Issues/Comments:

- As of May 27th USFilter had produced about 614,400 gallons of reverse osmosis (RO) permeate, and is currently averaging about 88,000 gallons of permeate per day. During the Phase I period that will last until early July the permeate will be stored on-site or blended with the double lime + aeration water being transferred to Manatee County. The reject is being segregated and stored on-site.
- Samples of 1st pass permeate, 2nd pass permeate, and reject from the USFilter Phase I RO system were collected the week of May 20th, with final results from the Dep lab expected over the next week or so. Additional permeate samples are scheduled to be collected the week on June 10th to be tested for possible toxicity due to ionic deficiency. The objective of the toxicity testing is to determine how to mediate any toxicity of the RO permeate (caused by low ion concentrations) through the addition of well water or other diluents containing common freshwater ions.
- The site's Receiver and DEP are having continuing discussions with representatives of agriculture lands adjacent to Piney Point in resolving technical and legal issues over use of RO permeate for irrigation. A preliminary evaluation of a nearby borrow pit indicated that between 50-90 million gallons of permeate could be stored over the upcoming rainy season. The site's Receiver is in negotiations with the pit representatives over use of the pit for storage over the rainy season.
- Manatee County, FP&L, the SWFWMD, and DEP met on May 24th to explore the feasibility of incorporating the RO permeate into the County's MARS system (Manatee Agricultural Reuse System).
- The TBEP is developing a monitoring plan for Bishop's Harbor in the event that RO permeate is discharged. The plan includes pre and post discharge benthic sampling and vegetation surveys, monitoring of nutrient loadings, and periodic water quality sampling during any discharge. Pre-discharge benthic samples have been collected.
- The Receiver contacted the City of St. Petersburg to inquire about trucking double-lime + aeration treated water to the City's south treatment plant based upon reports that the City is running out of reclaimed water for its residential users. The City is currently completing construction of upgrades at the plant. Concurrently, the City is discussing the implications of such transfers with the Department's Southwest District Domestic Wastewater permitting staff. Upon completion of the discussions with the Department and the ongoing constructions, shipments to the City may occur later this summer.

Please contact me at (850) 413-8192, extension 41 if you have any questions.

Cc: Allan Bedwell
Deborah Getzhoff
Mimi Drew
Janet Llewellyn
Joe Bakker

Primary Water Management Options - Status

Option	Estimated or Actual Start Date	Estimated Rate	Estimated Capacity*	Current Status or Comments
Manatee County WWTPs	3/6/02	150,000 gpd+	24 MG**	Transfer by trucks began on 3/6/02. As of 5/27/02 a total of 6,190,000 gallons had been transferred. It is estimated that 24 MGD can be transferred to both plants by in consideration of potential wet weather limitations.
Raise dikes on N. compartment of old north gypsum stack	3/21/02	NA	53 MG	Construction complete.
Raise dikes on S. compartment of old north gypsum stack	4/24/02	NA	39 MG	95% complete as of 5/27/02. Estimated completion date is 6/6/02.
Segregate clean/contaminated run-off areas	3/21/02	NA	13 MG	Fertilizer products continue to be hauled off-site.
Cargill Riverview	6/10/02	100,000 gpd	18 MG	Transport initially by truck. Truck loading facility construction is completed. Transfer agreements have been executed. The lime station repairs are needed before trucking can begin. Repairs are to be completed by 6/7/02.
CF Plant City	6/17/02	300,000 gpd	55 MG	Transport initially by truck. Truck loading facility construction completed. Transfer agreements under negotiation.
RO – Phase I and II	5/8/02	85,000 – 600,00 gpd	61 MG***	Contract with U.S.Filter signed on 4/16/02 and Phase I units “turned on” on 5/8/02. Phase I required rate of 60-90 gpm achieved by 5/21/02. Phase II is scheduled to begin early-mid July.
RO – Phase III	Unknown	Varies	Varies	Need, timing, and capacity for Phase III to be determined based on progress towards meeting water management goals and to facilitate closure of the site.
Bishop Harbor Discharge in event of unforeseen emergency	Based on trigger level	500,000 gpd up to 1 mgd	Based on trigger level	Engineer to establish “trigger level” by 6/30/02.

* The capacities listed in this table are the individual water management capacities for each option that are estimated to be achieved by the end of the rainy season.

** Only 21 of the 24 MG should be considered in meeting the water management goals, as the pond from this water is transferred already contained 3 MG of treated water.

*** Under the U.S.Filter agreement RO permeate of 5.2 MG (Phase I) is required by July 3rd with an additional 69.8 MG (Phase II) by 10/7/02. For planning purposes only 61 MG of the 75 MG total is being considered for meeting the water management goals due to potential unit down times.

DAN MILLER
13TH DISTRICT, FLORIDA

COMMITTEE ON
APPROPRIATIONS

COMMITTEE ON GOVERNMENT
REFORM

CHAIRMAN, SUBCOMMITTEE
ON THE CENSUS

ASSISTANT MAJORITY WHIP

Congress of the United States
House of Representatives
Washington, DC 20515-0913

May 28, 2002

The Honorable Henry Bonilla
Chairman, House Agriculture Appropriations Subcommittee
2362 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Bonilla:

I am writing to request that the fiscal year 2003 Agriculture Appropriations bill include \$3 million for the Florida West Coast Resource and Development area to fund the Manatee Agricultural Reuse System (MARS) project. I am requesting this \$1.5 million increase from my original request dated March 21, 2002 because of a vast wastewater resource recently identified within the Piney Point Phosphoric Acid plant in Manatee County, Florida. Tapping this plant and the 1.2 billion gallons of processed water it holds has the dual benefit of alleviating an impending environmental crisis and accelerating the MARS project.

By promoting recycling and reclamation of water resources, MARS serves to reduce environmental stress while simultaneously improving the efficient re-allocation of precious water resources. This is evident not only in the millions of gallons of drinking water that would be saved, but also—as in the case of the Piney Point Phosphoric Acid plant—in the 1.2 billion gallons of acidic water that will: 1) be treated and reclaimed for agricultural use to the benefit of farmers and 2) be prevented from spilling into the state's waterways, devastating ecosystems and exacting the State of Florida more than \$35 million in previous clean-up costs. With the state's hurricane and rainy season approaching, and the precarious condition of the plant's gypsum stacks, Piney Point Phosphoric Acid plant is a crisis waiting to happen. By requesting an additional \$1.5 million in funding to utilize the wastewater at the Piney Point Phosphoric Acid plant, I hope to avert a costly environmental catastrophe while simultaneously providing additional water resources for the MARS program.

Designated the #1 project priority by Governor Jeb Bush's office in 2000, MARS remains of utmost importance to the state and 13th district because it is a method to increase water supply availability through treated wastewater reclamation and recycling. The funding provides direct assistance in bringing the alternative water supply for irrigation onto the farm. USDA funds are also identified for capture of excess agriculture irrigation water and distribution of a blended product to the farmer. The funding is necessary to compensate farmers for the added cost of accessing reclaimed water from transmission lines as opposed to relying on their overused aquifers.

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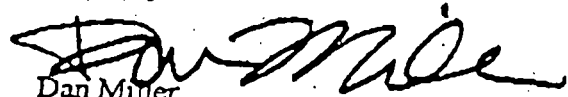
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INTERNET ADDRESS:
www.house.gov/danmill

Thank you for your consideration of this request. Please feel free to contact me or Thy Nguyen of my staff at 225-5015 should you have any questions. I look forward to working with you as we move this legislation through Congress.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Miller", with a stylized flourish at the end.

Dan Miller
Member of Congress

DAN MILLER
13TH DISTRICT, FLORIDA

COMMITTEE ON
APPROPRIATIONS

COMMITTEE ON GOVERNMENT
REFORM

CHAIRMAN, SUBCOMMITTEE
ON THE CENSUS

ASSISTANT MAJORITY WHIP

Congress of the United States
House of Representatives
Washington, DC 20515-0913

April 15, 2002

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The Honorable James Walsh
Chairman Appropriations Subcommittee on VA, HUD and Independent Agencies
H-143 The Capitol
Washington, DC 20515

Dear Chairman Walsh:

I have enjoyed working with you in the past on the Appropriations Committee and, once again, look forward to working with you to create a strong Fiscal Year 2003 Appropriation bill.

As this is my last year in Congress, please consider this letter as my final request list for the Fiscal Year 2003 VA HUD and Independent Agencies Appropriation bill. Referenced below are several important issues in my district that require assistance in this new fiscal year.

Manatee Agricultural Reuse Supply (MARS), Manatee County, Florida Cost: \$2 million

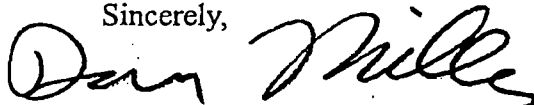
I respectfully request your support and assistance for inclusion of \$2 million to fund the Manatee Agricultural Reuse Supply (MARS) project under the State and Tribal Assistance Grants (STAG) in the FY 2003 VA HUD and Independent Agencies Appropriations bill. Water supply is an issue of utmost concern for the future of my district and Florida's economy and environment.

The MARS project will interconnect three regional wastewater treatment plants to distribute reclaimed water to urban and agricultural consumers for irrigation needs. The project provides a significant opportunity to reduce existing ground water withdrawals, minimize saltwater intrusion, mitigate lake level declines, eliminate surface water disposals and a deep well injection unit, and relieve competition for existing groundwater.

MARS also continues to be a top priority request for Florida Governor Jeb Bush. I would appreciate the support the Subcommittee has given in recent years. Continuation of the federal-state partnership to fund projects such as MARS will ensure that Florida's water supply will be sufficient to protect its sensitive environment while maintaining the state's economic well being.

I want to thank you in advance for your consideration of the above-referenced requests. I look forward to working with you in this regard and towards completing the VA HUD and Independent Agencies Appropriation bill. Please do not hesitate to contact me or Melissa Figge in my office at 225-5015 with any questions about these requests.

Sincerely,



Dan Miller
Member of Congress

MANATEE
Herald-Tribune

DIANE MCFARLIN, Publisher

JANET WEAVER, Executive Editor

THOMAS LEE TRYON, Editorial Page Editor

ROSEMARY ARMAO, Managing Editor

WILLIAM H. HANSEN, Manatee Publisher

EDITORIALS

An immovable beast

Long after mining, huge 'gyp stacks' cause costly harm

Florida's phosphate industry likes to portray mining as a "temporary" use of the land. But there's evidence to the contrary — 1 billion tons of it, piled up around the state in towering, impossible-to-overlook mounds of radioactive waste.

Those 24 mounds contain phosphogypsum and highly acidic water, byproducts of turning phosphate rock into fertilizer. The Environmental Protection Agency has banned most uses of the phosphogypsum, forcing mining companies to stockpile the waste indefinitely.

Two of the most notorious "gyp stacks" — as they're known in the industry — can be seen at the defunct Piney Point fertilizer-processing plant north of Palmetto. The above-ground stacks, abandoned a year ago by the defunct Mulberry Corp., contain an estimated 1.2 billion gallons of acidic water.

State and local officials are scurrying to reduce water levels atop the stacks. If they don't, heavy rains in the next few months could send the water spilling into Tampa Bay, causing a massive fish kill or worse.

The crisis at Piney Point is a timely reminder that state officials need to develop a long-term plan for the safe maintenance of gyp stacks — before mining companies are allowed to move southward into new sections of Southwest Florida, where they'll create even more waste.

Forever ours

Unless a safe use is found for phosphogypsum, it's unlikely Florida's 24 stacks will be eliminated. In central Florida, the concentration of uranium and radium-226 in phosphogypsum is 10 times the background level of uranium in soil and 60 times the level of radium-226 in soil — both higher than the EPA's acceptable risk limits.

It's clear these huge, immovable piles of waste pose an obvious long-term environmental problem, but in Manatee County, the immediate concern is the acidic water on top of the mounds.

Charlie Hunsicker, Manatee's ecosys-

tems manager, says county officials met again Friday with representatives from the state Department of Environmental Protection and the Southwest Florida Water Management District to discuss solutions.

In recent months, some of the water has been treated with lime and sent to the county's sewage-treatment plant, but that effort is only a short-term fix. In time, the county hopes to treat the water in a reverse-osmosis process, then distribute it for agricultural use. As part of the plan, excess water might be stored at a cooling pond at Florida Power & Light's power plant in Parrish.

Hunsicker is optimistic the treatment and reuse plan will solve the water crisis at Piney Point and perhaps serve as a model for taking care of acidic water at other gyp stacks around the state. The question remains: Who pays for it?

Take a longer view

Manatee officials hope the federal government will contribute toward the estimated \$10 million necessary to build pipes to distribute the water at Piney Point. The state expects to spend up to \$35 million to install and operate the reverse-osmosis plant, according to Hunsicker.

To take care of Piney Point and another defunct plant at Mulberry, DEP officials predict they'll use all or most of a \$80 million trust fund created with money from the phosphate industry. Ordinarily, the fund is used to pay for reclaiming land strip-mined prior to 1975, before the industry was forced by law to recontour, revegetate and generally tidy up its land.




The Piney Point debacle and the huge financial burdens it has imposed on the public will, we hope, prompt a full-scale reassessment of how much the industry contributes to the state treasury and the cleanup fund. Taxpayers have already paid too much to stabilize gyp stacks and clean up waste.

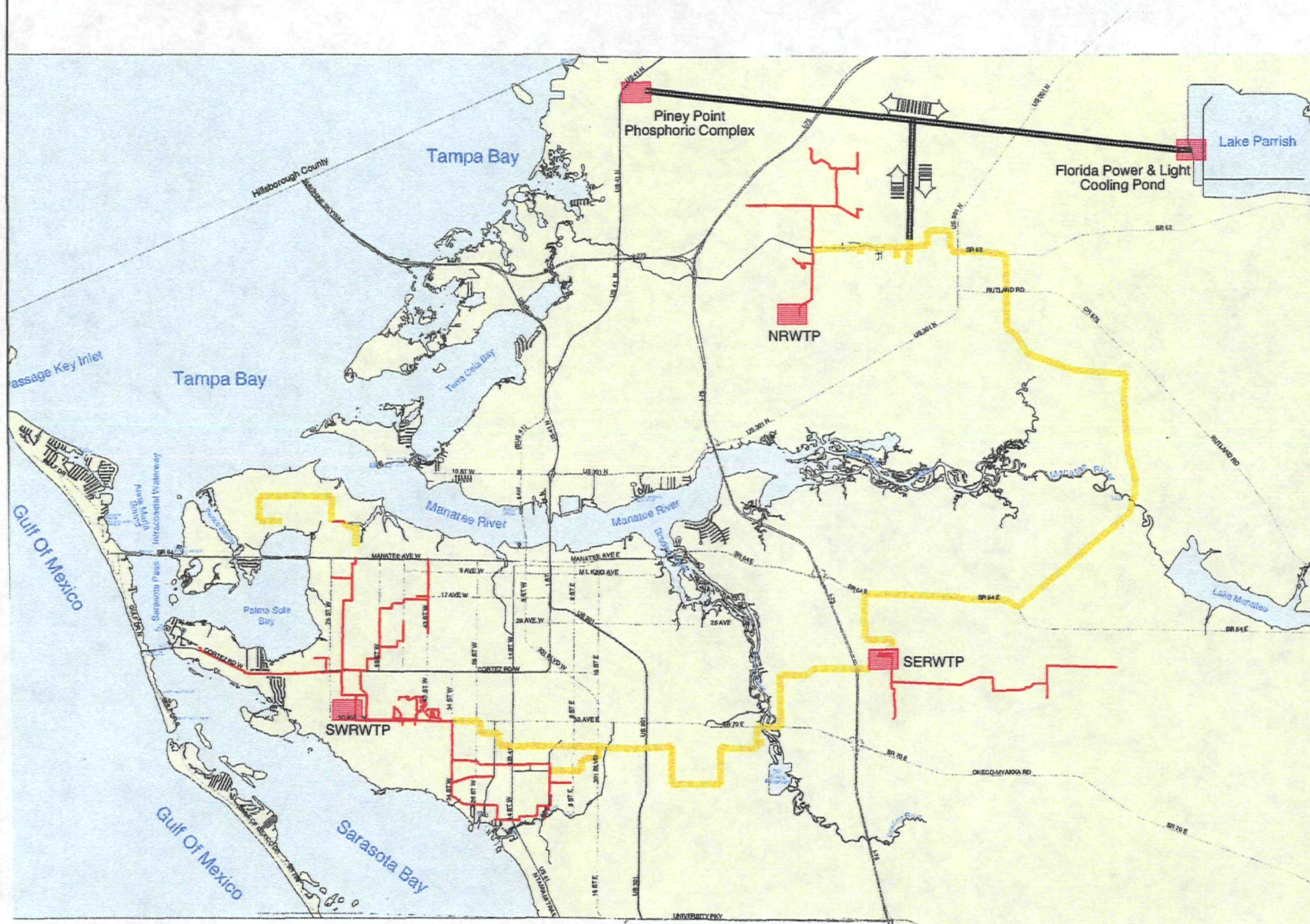
The effects of mining and processing aren't temporary. The industry's responsibilities shouldn't be, either.

5/29/02

Proposed Phosphoric Acid Plant R.O. Treated Water Pipeline/MARS Interconnect

Manatee County, FL Legend

-  Proposed Pipeline/MARS Interconnect
-  Existing Reuse Line
-  Proposed MARS Reuse Line



4000 0 4000



Source:
The data depicted in this map was
provided by agencies outside of the
Land Information Systems Department.

This map was developed using the Manatee County Land Information System. It is provided for general reference, is subject to change, and is not warranted for any particular use or purpose. The information contained within is derived from several sources of varying quality and accuracy. Errors from non-coincidence of features from different sources may be present.